

Nicholas A. Trutanich  
United States Attorney  
District of Nevada  
Nevada Bar Number 13644  
Robert A. Knief  
Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
Telephone: (702) 388-6336  
Email: Robert.Knief@usdoj.gov  
Counsel for Plaintiff United States

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**-oOo-**

United States of America,  
  
Plaintiff,  
  
vs.  
  
Chang Zheng,  
  
Defendant.

Case No.: 2:13-cr-0040-APG-VCF  
Stipulation to Reset Deadline  
(First Request)

It is hereby stipulated and agreed, by and between Nicholas A. Trutanich, United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the United States of America, and Nicholas Wooldridge, counsel for defendant Chang Zheng, that the deadline for the government to respond to defendant's Motion to Suppress Evidence (ECF #200), be reset for August 2, 2019, or a date thereabouts convenient for the Court.

This stipulation is entered into for the following reasons:

1. At the time defendant filed the motion, counsel for the government was on a absent from the office. Counsel for the government needs the additional time to properly prepare a response.

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2. The parties are engaged in negotiations that will likely resolve the without the need to resolve the suppression issue.

3. Defendant is not in custody and does not object to the continuance.

4. For the reasons stated above, the ends of justice would best be served by a continuance of the government deadline.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

6. This request does not extend the trial date and no waiver or extension of speedy trial is necessary.

7. This is the first request for a continuance filed herein.

DATED this 25th day of June, 2019.

Respectfully submitted,

Nicholas A. Trutanich  
United States Attorney

/s/ Nicholas Wooldridge  
Nicholas Woolridge  
Counsel for Defendant

/s/ Robert Knief  
Robert Knief  
Assistant United States Attorney

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### Stipulation to Reset Deadline

(First Request)

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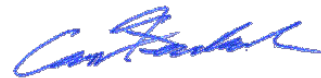
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1 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the  
2 opportunity within which to be able to effectively prepare a response, taking into account the  
3 exercise of due diligence.

4 **ORDER**

5 IT IS THEREFORE ORDERED that the government response to defendant's Motion  
6 to Suppress (ECF #200), is due by the close of business on the 2nd day of August, 2019.

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8 DATED this 25th day of June, 2019.

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12 CAM FERENBACH  
13 UNITED STATES MAGISTRATE JUDGE  
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